

MEMORANDUM

SUBJECT: RD review of 1/2000 preliminary RED documents concerning  
oxamyl (0253/103801):  
1) EPA RED chapters  
2) 2/18/2000 Dupont preliminary review of RED chapters

FROM: Thomas C. Harris  
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THROUGH: Tina E. Levine, Chief  
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TO: Carmelita White  
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I have reviewed both the 1/2000 preliminary EPA RED chapters and the registrant's (Dupont) preliminary review of these chapters. My review has focused on the descriptions of use patterns (sites, rates, application methods, etc.).

I found about a dozen errors (detailed in Attachment 1) in the EPA documents. HED and EFED should review these changes to see if these corrections impact their risk analyses.

I have verified the use pattern corrections noted by the registrant in their comments; Dupont's comments are correct. However, Dupont did not note any of the use pattern errors which I found; they should be sent a copy of this review.

## ATTACHMENT 1.

RD COMMENTS ON OXAMYL (0253/103801) RED DOCUMENTS  
3/27/2000, THarris

page	topic	comment
document reviewed: "Occupational Exposure and risk assessment regarding the use of oxamyl" RSandvig		
5	use sites / food, forage, ...	Add "squash" to the list.
5	application rates / food, forage, ...	<p>1) Yams: Maximum rate is not 2 lb ai/A. It's hard to say what it is, however. Label maximum is 0.5 lb ai/A foliar spray or 2 lb ai/100 gallons water as a dip for seed pieces. I don't think "per acre" is appropriate for the latter (even though it does say so on the label; I'll get it changed).</p> <p>2) Bananas, plantains: Maximum rate is not 2 lb ai/A. Again, it's an odd expression. Label says "10 ml/corm" which equals 0.005284 lb ai/corm. If you want to convert corms to acres you need to make some assumptions about planting density. State rate differently or state planting density assumptions in a footnote if using "/A."</p>
5	application rates / tree crops	<p>1) Maximum rate for foliar application to citrus is same as other crops: 2 lb ai/A.</p> <p>2) Crops are same for both soil and foliar application. It would be clearer to phrase as "non-bearing trees (apple, cherry, citrus, peach, and pear)".</p>

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page	topic	comment
document reviewed: "Anticipated Residue and Acute and Chronic Dietary Exposure Estimates" JPunzi		
4	paragraph 1, list of sites	Delete "strawberries" from non-bearing list. Oxamyl use on strawberries has been deleted.
4	paragraph 3, rates & PHI	1) Maximum seasonal rate is 12 lb ai/A (not 10). [see 352-372, yams]] 2) [optional] List of PHI's is correct but a fuller description could read: "The PHI is generally 7-14 days (yams (60 day PHI); ginger, pineapple (30 day PHI); celery, cotton (21 day PHI); tomato (3 day PHI); cucurbits/melons (1 day PHI) are notable exceptions).
10	celery, PHI	Celery PHI is 21 days (not 14).
12	mint, max/season	Mint maximum seasonal rate is 4 lb ai/A (not "not specified").
12	onion, max, max/season	1) Onion maximum single application is 4 lb ai/A (not 6). 2) Onion maximum seasonal rate is 4.5 lb ai/A (not 6).
12	peanut, PHI	Peanut PHI is not specified (not 30 days).
13	peppers, max	Pepper maximum single application is 1 lb ai/A (not 2).
13	potatoes, max	Potato maximum single application rate is 4 lb ai/A (not 8).
14	tomatoes, max seasonal	Tomato maximum seasonal rate is 8 lb ai/A (not 12).

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page	topic	comment
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document reviewed:		
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"HED chapter of the reregistration eligibility decision document" CJarvis		
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14	paragraph 2, application rates	Lowest oxamyl rate is 0.125 lb ai/A/day (not 0.25). [see 352-532, cotton, boll weevil]
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page	topic	comment
document reviewed: "Revised residue chemistry chapter for the oxamyl RED" JPunzi		
general note: The table on pages 6-24 was generated by a contractor. Errors listed for this table are mainly related to rates and PHIs. Due to the complexity of the table the RD reviewer acknowledges that he has not done a thorough job of checking application methods and use limitations. It is recommended that the "LUIS table for residue chemistry analysis" be used in place of this contractor generated table.		
6	apple dilute spray application	[comment on table style; does not affect use pattern] Combine lines for PA, VA, NJ and WV. Use pattern is same.
7	celery	PHI is 21 days for all application methods (not 14).
7	celery PA800039	Delete this line. This SLN was canceled.
8-9	celery broadcast application	[comment mainly on table style; minor affect on use pattern] Delete lines for FL, CA. Add FL, CA to line for AZ. Use patterns are same (note: all using at least 10 gal water/A for aerial).
13-15	onion, bulb	Maximum seasonal rate is 4.5 lb ai/A for all application methods (not 6). PHI is 14 days for all application methods (not 7).
15	onion, bulb NY	In first line, maximum single application rate is 4 lb ai/A (not 0.5). Use limitation correctly states rate as 2 gals/A (=4 lb ai/A).
17	pepper	PHI is 7 days for all application methods (not 14).
19	potato use prohibited in CA, Northeast, Mid-Atlantic	Maximum single application rate is 4 lb ai/A (not 8). Maximum number of applications is 6 (not NS).
19	potato use limited to Northeast and Mid-Atlantic	Maximum number of applications is 6 (not NS).

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page	topic	comment
21, 22	tomato	Maximum seasonal rate is 8 lb ai/A (not 12) for all application methods.
22	tomato sprinkler or furrow irrigation injection shank	Maximum single application rate is 1.25 lb ai/A (not 0.75).